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While I appreciate this opportunity to submit comments concerning the President's Council on Food Safety Strategic Plan, I wish to register my disappointment in the meeting that I attended on July 15, 1999. The meeting did not seem truly intended to move things along, but to give the appearance that the government seeks public input concerning matters that have already been chewed on (for years) without action.

Representatives from three animal welfare organizations--United Poultry Concerns (UPC), The Humane Society of the United States (HSUS), and Farm Animal Reform Movement--participated in the morning and afternoon Break Out Sessions. UPC and HSUS discussed the relationship between husbandry practices at the farm level and microbial food safety problems. In the closing Plenary Session, four of the five closing statements referred specifically to the need to address problems at the animal production level. However, in her final summation, Dr. Catherine Woteki did not include, and seemed actually to ignore, the emphasis that the majority of those of us who spoke at the mike placed upon the need to focus on the serious animal welfare problems that have been documented as sources of foodborne illnesses.

In the February 3, 1995 Federal Register notice of its proposed HACCP rule, the Food Safety and Inspection Service acknowledged the relationship between the treatment of animals in the food system and transmission of foodborne pathogens to humans.

There are major aspects in the production phase that can influence incidence, control, and prevention of potential human pathogens. . . . Management systems addressing increased animal welfare and better husbandry decrease levels of stress, and would be expected to decrease the incidence of pathogens. For example, improvements in cattle handling systems reduce stress-related immune suppression associated with animal processing procedures. A number of other factors, such as animal density, frequency of feedlot pen use, and commingling of sick animals, can affect stress levels and thus risk of human pathogen exposure. . . .

Stressed animals have lowered disease resistance, making them more susceptible to pathogens and at increased risk of shedding potential human pathogens. Various forms of stress can result in increased shedding and clinical disease, causing increased exposure to penmates, increasing the risk also to humans through contaminated meat."

The Journal of the American Veterinary Medical Association (JAVMA) reported on December 15, 1998, that Salmonella is a "major public health problem." "Eggs are the predominant source of Salmonella Enteritidis infections in humans." Many of the egg-associated Salmonella outbreaks in the United States "were traced back to the farm of origin and have documentation that infected hens were the source of the outbreak." The JAVMA concluded that while consumers can reduce the risk of Salmonella infection by avoiding eating undercooked or raw eggs, "control of Salmonella will require preventing infections in egg-laying and broiler chickens."

According to Egg Industry Magazine, June 1999, "Reduced feed and water intake is the most detrimental and universal aspect of disease" in laying hens. This should make the elimination of forced molting of laying hens a food safety priority given the extensive documentation showing that deliberately depriving the birds of sustenance impairs their immune systems and promotes Salmonella Enteritidis infection and contaminated eggs. As FSIS wrote on August 21, 1998, "FSIS recognizes that public health concerns are raised by highly stressful forced molting practices. For example, extended starvation and water deprivation practices lead to increased shedding of Salmonella enteritidis (SE) by laying hens subjected to these practices. Therefore, in an effort to reduce human illnesses caused by Se, FSIS is encouraging poultry and egg producers to eliminate forced molting practices."

United Poultry Concerns would like to see implementation of

the above. We would also like to see much more active government promotion of an animal-free vegetarian diet.

Thank you for your attention.

Sincerely,

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President
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